

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Ciardi Ciardi & Astin
Albert A. Ciardi, III, Esquire
Daniel S. Siedman, Esquire
1905 Spruce Street,
Philadelphia, PA 19103
Telephone: 215-557-3550
Facsimile: 215-557-3551
aciardi@ciardilaw.com
dsiedman@ciardilaw.com

In re:

Daryl Fred Heller

Debtor.

Chapter 11

Case No. 25-11354 (JNP)

**LIMITED OBJECTION TO MOTION OF DEBTOR AUTHORIZING DHQM
PROPERTIES, LLC TO ALLOCATE AND DISTRIBUTE INTERESTS IN NON-
DEBTOR PROPERTIES TO ACCORDO, L.P. AND QDM PROPERTIES, LLC**

Deerfield Capital, LLC (“Deerfield”) asserts the following Limited Objection to the Debtor’s Motion seeking the entry of an order authorizing DHQM Properties, LLC to allocate and distribute interests in Non-Debtor Properties to Accordo L.P. (“Accordo”) and QDM Properties, LLC (the “Motion”) and in support thereof avers as follows:

1. Deerfield is a limited liability company formed and operating in the Commonwealth of Pennsylvania, with a mailing address of 16 Deerfield Road, Lancaster, PA 17603. Deerfield is a secured creditor of the Debtor.
2. At the outset, Deerfield objects to the Debtor filing this Motion as the Debtor allegedly does not have an interest in Accordo, DHQM or QDM.
3. Additionally, Deerfield did name DHQM 3, LLC in its fraudulent transfer action and reserves the right to amend that action to include DHQM pending further discovery.
4. DHQM 3, LLC is subject to the Status Quo Order (as defined below).

5. Deerfield does not object to QDM receiving their portion of the alleged distribution but Deerfield requests that the Court preserve the status quo order on any property received by Accordo and that all rights of Deerfield or the estate to assert that Accordo is owned by the Debtor are preserved.

6. Deerfield also reserves the right to contest the values of the properties being distributed at the time of the hearing.

7. Deerfield has filed a separate adversary action against Accordo and other parties with regard to alleged fraudulent transfers that involve the Debtor.

8. On or about March 14, 2025, this Court entered a Consent Order preserving the Status Quo (the "Status Quo Order"). *See* D.N. 119.

9. The purpose of the Status Quo Order was to prevent the distribution of **any** proceeds, interests and/or properties absent further Court Order to ensure that parties have a valid and legal claim.

10. As such, Deerfield reserves all rights, remedies, and claim.

11. Furthermore, if this Motion is granted, the Court must find that any interests remaining with Accordo are subject to the Status Quo Order.

Ciardi Ciardi & Astin

By: 

Albert A. Ciardi, III, Esquire
Daniel S. Siedman, Esquire
1905 Spruce Street,
Philadelphia, Pa 19103
215-557-3550
215-557-3551 (fax)
Attorneys for Deerfield Capital, LLC

Dated: August 11, 2025